

LAW OFFICES OF DALE K. GALIPO

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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

KATHERINE ROBLES, an individual;
and H.R., by and through his guardian ad
litem Katherine Robles,

Plaintiffs,

v.

CITY OF ROSEVILLE, a Municipal
Corporation; OFFICER DEAN RIANO,
in his official and personal capacity;
OFFICER SETH ADDINGTON, in his
official and personal capacity;
SERGEANT CHRISTOPHER
CIAMPA, in his official and personal
capacity; and DOES 1-20, inclusive,
individually, jointly, and severally,

Defendants.

Case No. 2:22-cv-00085-DC-SCR
District Judge: Hon. Dena Coggins
Magistrate Judge: Hon. Sean C.
Riordan

**STIPULATION TO CONTINUE
DEADLINES FOR EXPERT
DISCLOSURES, EXPERT
DISCOVERY, AND SUBSEQUENT
DATES; AND PROPOSED ORDER**

IT IS HEREBY STIPULATED by and between Defendants, City of
Roseville, Officer Dean Riano, Officer Seth Addington, and Sergeant Christopher
Ciampa, and Plaintiffs, Katherine Robles and H.R., by and through their respective
attorneys of record as follows:

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- 1 1. For months, the Parties have been engaged in extensive meet and confer
2 efforts in good faith regarding the scope of FRCP Rule 35 Examinations
3 of Plaintiff Katherine Robles.
- 4 2. After months of meet and confer efforts, the Parties reached an
5 agreement regarding the scope, date, and location for two FRCP Rule 35
6 Examinations (a physical examination and a mental examination) of
7 Plaintiff Katherine Robles.
- 8 3. These examinations took place on October 24 and 25, 2024. However,
9 due to a misunderstanding regarding the timing of the examinations,
10 Plaintiff did not complete the mental examination on October 25, 2024,
11 and a second portion of that examination has been scheduled for
12 December 11, 2024.
- 13 4. To allow sufficient time for the parties' experts to consider any results of
14 this completed examination, the Parties agree there is good cause to
15 further modify the scheduling order as follows:
 - 16 a. Deadline for Initial Expert Disclosures: January 15, 2025
 - 17 b. Deadline for Supplemental/Rebuttal Expert Disclosures: February
18 14, 2025
 - 19 c. Expert Discovery deadline: April 11, 2025
 - 20 d. All dispositive motions must be filed by: June 13, 2025

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1 IT IS SO STIPULATED.
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3 Dated: December 3, 2024

LAW OFFICES OF DALE K. GALIPO

5 /s/ Benjamin S. Levine

6 Dale K. Galipo
7 Benjamin S. Levine
8 *Attorneys for Plaintiffs*

9 Dated: December 3, 2024

PORTER SCOTT

10 A PROFESSIONAL CORPORATION

11 /s/ William E. Camy

12 William E. Camy
13 Megan N. Boelter
14 *Attorneys for Defendants*
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